

SEXUAL HARASSMENT PREVENTION AND RESPONSE POLICY

HARASSMENT

Sexual and other unlawful harassment is a violation of Title VII of the Civil Rights Act of 1964 (Title VII), as amended, as well as many applicable national and state laws. Harassment based on a characteristic protected by law, such as race, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, veteran status, language, political or other opinion, pregnancy, or other characteristic protected by applicable national or state laws, is prohibited.

It is **Moremi Capital's** policy to provide a work environment free of sexual and other harassment. In accordance with applicable laws, we will provide regular training and education to ensure our employees are aware of the standards to maintain a healthy environment. Harassment of **Moremi Capital's** employees or persons working on the Company's premises, by management, supervisors, coworkers, or non-employees who work with Moremi Capital, is absolutely prohibited. Further, any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. **Moremi Capital** will take all steps necessary to prevent and eliminate unlawful harassment.

Definition of Unlawful Harassment. "Unlawful harassment" is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts; based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by applicable law.

Definition of Sexual Harassment. While all forms of harassment are prohibited, special attention should be paid to sexual harassment. "Sexual harassment" is generally defined under applicable laws as unwelcome sexual advances, direct or indirect requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual's employment or as a basis for employment decisions; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's employment, work performance or work satisfaction or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers or suggests the benefit of a preferential treatment may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwanted sexual advances, whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, or cartoons;
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments;
- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities.

All employees should take special note that, retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated at **Moremi Capital**.

COMPLAINT PROCEDURE

Informal Steps to Resolve Harassment

If you consider that you are being harassed, you should initially attempt to resolve the problem informally with the person responsible if you feel able, and explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing to do on your own, you should seek support from the HR Department, who will provide confidential advice and assistance where appropriate and will offer to assist in the resolution of any problems, whether through informal or formal means.

If you are in any doubt as to whether an incident or series of incidents which have occurred constitute harassment, then you should initially contact the HR Department confidentially, on an informal basis. All such enquiries will be handled with full anonymity.

Complaint Procedure. Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. You may complain directly to your immediate supervisor or department manager, the Human Resources Department, or any other member of management with whom you feel comfortable bringing such a complaint.

Similarly, If you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

Anonymity and Confidentiality. **Moremi** recognizes that fear of identification is one of the most significant barriers to reporting sexual harassment. To the extent possible, the Company will protect the identity of any individual who makes a complaint or participates in an investigation.

All reports will be handled with strict confidentiality and shared only with those directly involved in the

investigation process. No information identifying the complainant will be disclosed to the respondent or any other party without the complainant's explicit consent, except where disclosure is required by law or necessary to conduct a fair investigation.

Where a complainant requests anonymity, the Company will make reasonable efforts to honor that request while acknowledging that full anonymity may limit the scope of the investigation. In such cases, the Company will inform the complainant of any constraints this may place on the process before proceeding.

Retaliation against any individual who makes a report either for themselves or for others, participates in an investigation, or requests anonymity is strictly prohibited and will be treated as a separate disciplinary offence.